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Arizona Corporation Commission

IN THE MATTER OF QWEST  
CORPORATION'S COMPLIANCE WITH  
§ 271 OF THE  
TELECOMMUNICATIONS ACT OF  
1996.

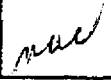
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**QWEST'S FILING ON LNP COST ESTIMATES PURSUANT TO  
STAFF'S REPORT ON CHECKLIST ITEM 11**

**INTRODUCTION**

In Staff's Supplemental Report on Checklist Item 11, local number portability, Staff requested that Qwest supplement the record with information from vendors to whom Qwest has requested quotes to create an automated disconnect system for number porting when CLECs fail to complete their provisioning work on time.<sup>1</sup> Qwest hereby submits the Affidavit of Ms. Maureen Callan attached to this brief and Confidential Exhibit 1 in response.<sup>2</sup>

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<sup>1</sup> Staff's Supplemental Report on Qwest's Compliance with Checklist Item No. 11—Local Number Portability (LNP), ¶ 31 (Dec. 24, 2001).

<sup>2</sup> The vendors who have provided cost quotations to Qwest have asserted that the quotes are highly confidential and proprietary to them and have not authorized Qwest to provide the cost quotations without assurance that the information they consider to be highly confidential will be protected. At least one vendor has expressed concern that the current protective order may not apply to their third-party information because they are not a party to this docket.

Qwest implemented an industry approved automated process to support number portability in August 2001. Qwest's current performance data shows that Qwest's automated solution ensures that 99.99% of all numbers ported are not disconnected so long as CLEC notifies Qwest in some reasonable time frame that it has not completed its provisioning work. Qwest also attaches Ms. Callan's affidavit to establish the extreme cost and process changes that Qwest would incur to move to the different mechanized solution recommended by AT&T. Given the outstanding performance of Qwest's automated solution, there is simply no reason to change course now. As set forth herein, consistent with Staff's Supplemental Report on Checklist Item 11, the Commission should find that the mechanized process changes Qwest has already implemented fully address AT&T's concerns, and that Qwest is not required to incur the extraordinary expense to implement AT&T's preferred solution.

### DISCUSSION

During the workshops on number portability, the dispute between the parties focused on situations when the CLEC has its own loop, orders number portability from Qwest, and cannot perform its own provisioning work on the scheduled due date. These are not situations in which *Qwest* fails to perform its provisioning obligations, but where the *CLEC* is unable to perform its work on time. In these situations, if the CLEC failed to inform Qwest in a timely manner of the CLEC's inability to provision service, there was a risk that the customer would be disconnected when Qwest removed the switch translations on the scheduled due date. It has always been Qwest's position that these disconnects can be largely eliminated by the simple expedient of the CLEC providing Qwest notice when the CLEC cannot perform its provisioning activity.

To afford CLECs additional time to provide notice to Qwest and to prevent such disconnects, Qwest implemented a mechanized solution to hold the disconnect of switch translations associated with LNP orders until 11:59 p.m. on the day following the due date. The first phase of this process, which delayed the disconnect of the switch translations until 11:59

p.m. of the day after the due date, was implemented as planned on June 5, 2001 for Arizona.<sup>3</sup> The second phase, which delayed the completion of the disconnect service order in the downstream systems for an additional day was scheduled for the end of August 2001; however, Qwest completed the work early and finalized implementation on August 19, 2001. The current process, therefore, allows affected CLECs to contact a Qwest Escalation Center, either in a live conversation or through electronic messaging, by 8:00 p.m. on the due date to notify Qwest that the CLEC did not complete its provisioning work and Qwest should hold the disconnect. Once this information is received, Qwest personnel will input the change into its systems and the mechanized solution will ensure that the disconnect does not occur.

Significantly, since Qwest implemented this solution, the industry has agreed in the Local Number Portability Administration ("LNPA") Working Group, which reports to the North American Numbering Council, that Qwest's solution to hold the disconnect until 11:59 p.m. on the date following the due date is an industry-accepted means of reducing customer disconnects. Callan Affidavit ¶ 13. Specifically, the LNPA Working Group addresses LNP issues through the LNP Problem/Issues Identification and Management ("PIM") process. PIM Issue 0013 was introduced in mid-2001 to address the issue of customer disconnects occurring before the port took place. *Id.* At the January 2002 LNPA Working Group meeting, the industry participants approved three options. One of the three alternatives approved is Qwest's process of holding the removal of switch translations until 11:59 p.m. on the date following the due date. *Id.* Accordingly, Qwest has been ahead of the industry on addressing this issue. The automated process Qwest put in place in August 2001 is now an industry-accepted option for minimizing customer disconnects.

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<sup>3</sup> Qwest implemented phase 1 throughout the region in stages: June 1<sup>st</sup> for Eastern states, June 5<sup>th</sup> for Central states which included Arizona, and June 7<sup>th</sup> for Western states.

As Qwest's performance results demonstrate, the current mechanized solution is working exceptionally well. In its supplementation of the record, Qwest presented interim performance results demonstrating that this mechanized solution was working and working well. Since that time, Qwest has begun reporting results for the OP-17 PID. In October through November 2001, Qwest ported 22, 562 numbers in Arizona. As the Arizona results since October 2001 demonstrate, Qwest's mechanized solution is working successfully.

#### **Arizona Results**

October 2001		November 2001		December 2001	
%	Misses	%	Misses	%	Misses
99.98	1	99.98	2	100	0

Callan Affidavit ¶ 23.

For all three months, Qwest's performance far exceeded the performance benchmark of 98.25%. Regionally, Qwest ported 142,036 telephone numbers during this timeframe and experienced only 18 misses, thereby far exceeding the benchmark objective in each month in each state. *Id.*

#### **Regional Results**

October 2001		November 2001		December 2001	
%	Misses	%	Misses	%	Misses
99.99	4	99.99	3	99.98	11

As these results show, Qwest is exceeding the performance benchmark in Arizona and regionwide. Qwest cannot confirm that implementation of the "BellSouth solution" would lead to any appreciable improvement in Qwest's already excellent performance results. Implementation of that process, however, would impose significant costs to address a problem

that can be avoided if CLECs simply communicate with Qwest when they are unable to meet their due dates.

Despite implementation of this mechanized process, AT&T has pressed for more. AT&T wants Qwest to implement the "BellSouth solution" discussed in the workshop sessions that would require Qwest to hold any disconnect activity until it receives an "activation" message from the NPAC. As Qwest set forth in its Supplementation of the Record on Checklist Item 11, no state commission has ordered Qwest to adopt this process, nor has the FCC required it of any BOC for which it has granted Section 271 approval. Nevertheless, Qwest committed to examine this process and the costs that it would impose. Attached to this filing is Ms. Callan's Affidavit which confirms that implementation of AT&T's preferred solution would cost millions of dollars. *Id.* ¶ 19. Furthermore, the vendor quotations Qwest received do not include the internal costs that Qwest would incur to implement this solution. As Qwest has stated in the workshops and previous filings, Qwest has many different Service Order Processor systems than BellSouth. *Id.* ¶ 17. Thus, in addition to the significant vendor costs this process entails, Qwest would have to make major modifications to its SOPS at considerable additional cost. Those cost estimates are included in Confidential Exhibit 1 to Ms. Callan's Affidavit. In addition, implementation of this solution could take twelve to eighteen months, *id.* ¶ 20, whereas Qwest's current process of holding the disconnect is already in place and, as shown above, is working very well.

Furthermore, the "activate" or "BellSouth solution" AT&T seeks is not without its own drawbacks. As Ms. Callan explains, basing Qwest's disconnect activity on the CLEC's NPAC subscription activation is not always reliable. *Id.* ¶¶ 24-27. For example, Qwest often receives escalation calls to the Interconnect Service Center from CLECs that have activated the port in the NPAC database and then discover that they are unable to provision service in their switch or are otherwise experience problems with the installation. *Id.* ¶ 24. When the CLEC sends the activation message to NPAC, but is unable to provision service, the end user will still be out of service if the previous service provider bases disconnect activities on the NPAC activation. This

problem with the "activate" solution has been recognized and discussed in industry forum meetings. *Id.* ¶ 25. Ms. Callan discusses other problems with the activate solution in paragraph 27 of her affidavit.

### CONCLUSION

Staff and the Commission should find that Qwest's efforts to prevent disconnects prior to CLEC completion of their provisioning are sufficient and satisfy Qwest's obligations under checklist item 11. Qwest respectfully requests that Staff and the Commission close this outstanding issue and recommend that Qwest meets the requirements of checklist item 11 in Arizona.

Respectfully submitted this 7<sup>th</sup> day of February, 2002.

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**BEFORE THE ARIZONA CORPORATION COMMISSION**

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CHAIRMAN  
JIM IRVIN  
COMMISSIONER  
MARC SPITZER  
COMMISSIONER**

**IN THE MATTER OF QWEST  
CORPORATION'S COMPLIANCE WITH  
§ 271 OF THE TELECOMMUNICATIONS  
ACT OF 1996**

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**DOCKET NO. T-00000B-97-0238**

**AFFIDAVIT OF  
MAUREEN L. CALLAN**

**STATE OF COLORADO  
COUNTY OF DENVER**

)  
)  
)

Maureen L. Callan, of lawful age being first duly sworn, deposes and states:

1. My name is Maureen L. Callan. I am Group Product Manager – Database Services, Global Markets for Qwest Services Corporation in Denver, Colorado. I am filing this Affidavit and the attached Exhibit pursuant to Staff's Supplemental Report on Checklist Item 11.

**I. BACKGROUND**

**A. NANC Guidelines for Scheduling LNP Disconnects**

2. The industry-developed LNP process flows , which were adopted by the North American Numbering Council ("NANC"), require that the old service provider disconnect service on the Due Date that is established by the new service provider. When Qwest began LNP deployment in July 1998, the disconnect time was automatically set for 8:00 p.m. on the Due Date for all Frame Due Times ("FDTs") prior to 8:00 p.m., or at the FDT if later than 8:00 p.m. The 8:00 p.m. disconnect time allowed additional time for the CLEC to contact Qwest in

the event that the CLEC was unable to activate the customer's service in its switch. Thus, this disconnect time provided CLECs an additional "cushion" while still meeting NANC guidelines.

3. Prior to the initial deployment of LNP, and throughout the deployment of LNP in 1998, 1999 and the first half of 2000, Qwest held workshops throughout its 14-state local region to ensure that CLECs were well-informed of the LNP ordering and provisioning processes. In addition, Qwest had ongoing dialogue with CLECs at carrier forums and in direct meetings and conference calls, and there were ongoing regional and national LNP operations team meetings where system and process issues were addressed. These avenues provided, and continue to provide, opportunity and impetus for the industry to develop and implement process improvements.

#### **B. Late Notification of Due Date Changes and Cancellations**

4. In preparation for the deployment of LNP, the industry developed systems and processes based on the NANC guidelines. Qwest has successfully interacted with more than eighty CLECs in the Qwest region in porting telephone numbers and coordinating Due Dates. Qwest has made every effort to accommodate late notifications. However, when Qwest is not notified until just a few minutes before the FDT, or several hours or even several days after the FDT, service has been disrupted, and Qwest is required to perform a "workback" and obtain facilities to put these end user customers back into service on an expedited basis.

5. To alleviate some of the workback volume, and to allow even more time for CLECs to complete their activations (or to notify Qwest if the port was not going to occur as scheduled), Qwest changed the disconnect time to 11:59 p.m. on the Due Date. This change took place in late 1999. The National Number Portability Operations ("NNPO") group addressed this issue in early 2000. Based on documentation that was submitted to the NNPO, some other

ILECs chose to charge CLECs for Due Date changes and cancellations. Qwest, however, did not impose such a charge.

## **II. EVALUATION OF TWO MECHANIZED SOLUTIONS**

6. In February 2001, the Administrative Law Judge ("ALJ") in Washington issued her Draft Initial Order in Workshop II stating that "Qwest should wait until 11:59 p.m. of the day following the scheduled port before disconnecting." At that time, Qwest was porting an average of approximately 4,000 telephone numbers per business day. As a result, manually holding the orders would have been difficult to manage in the Interconnect Service Center ("ISC"). In addition, the receipt of supplemental service orders (e.g. due date changes) would require careful handling to ensure proper relating of revised orders and proper sequencing of orders.

7. Qwest formed a team of subject matter experts ("SMEs") to determine the best course of action to address the Washington order. The Qwest SMEs evaluated two mechanized solutions. One solution was to hold the disconnection of the switch translations and the service order until after 11:59 p.m. of the day after the due date, or the "Delayed Disconnect" solution. The other was to hold the order until receipt of the activation message from the NPAC, or the "Activate" solution.

8. Qwest determined that a mechanized Delayed Disconnect solution could be implemented quickly, would resolve the issue of disconnects when the CLEC failed to perform its provisioning work on the due date, and would not impose major impacts on Qwest's Service Order Processing systems ("SOPs"). The Activate solution, on the other hand, was not directly compliant with the Washington order, would require considerable vendor development for some LNP software, and would require extensive internal system development for the SOPs. Qwest would also be required to purchase hardware to support the internal and vendor software.

Accordingly, Qwest made the decision to move forward quickly with the Delayed Disconnect solution, while continuing to gather more information about the Activate solution.

### **III. IMPLEMENTATION OF THE DELAYED DISCONNECT SOLUTION**

9. In March 2001, Qwest began work on an automated downstream system process to hold the disconnection of the switch translations associated with LNP orders. With this process, the APRIL (provisioning) system identified and intercepted the eligible port orders. The Due Date was extended for each port order, prior to sending the order to the MARCH (activation) system. The APRIL system alerted Switch Consultants that special due date processing had occurred. Qwest notified CLECs of the planned changes through the Change Management Process ("CMP"), and discussed the changes with them on CLEC conference calls that were held on May 16, 2001, and May 23, 2001.

10. An internal MCC (Multi Channel Communicator) was issued on June 1, 2001 advising the Qwest Wholesale functional groups, including Held Orders/Escalations, Order Processing and Order Resolution, as well as Repair and other work groups in Network, of the changes which were effective for any new port-out orders entering the system on:

June 1, 2001 Eastern Region

June 5, 2001 Central Region

June 7, 2001 Western Region

11. Effective Monday, August 20, 2001, with IMA Release 8.0, further automation allowed the LNP port orders to be issued with a delayed disconnect date, and an Effective Bill Date ("EBD") was established consistent with the CLEC's requested Due Date. With this release, both the switch translations and SOPs order completion are delayed. Qwest then discontinued the MARCH/APRIL interim solution.

12. Qwest notified CLECs of the August 20, 2001 changes and documented them in the Product Catalog. Qwest had planned to review this process change with the CLECs at a forum scheduled for September 12-13, 2001. However, that forum was cancelled as a result of the terrorist incidents in New York and Washington, D.C. On October 4, 2001, Qwest discussed these changes in a CLEC conference call.

13. The mechanized Delayed Disconnect solution exceeds the requirements that the industry agreed to via the Local Number Portability Administration ("LNPA") Working Group, which reports to the NANC. The LNPA Working Group addresses LNP issues on an ongoing basis through the Problem/Issues Identification & Management (PIM) Process. PIM Issue 0013 was introduced in mid-2001 to address the issue of customer disconnects prior to the port taking place. At the January 2002 LNPA Working Group meeting, the industry approved three options as acceptable solutions for this issue. The PIM documentation indicates that "any one of these approaches to preventing disconnect of the customer's switch translations prior to the port taking place is deemed acceptable." The NANC process flows are being updated by the LNPA Working Group to include the following text.

After update of its databases, the old Service Provider removes translations associated with the ported TN. The removal of these translations (1.) will not be done until the old Service Provider has evidence that the port has occurred, or (2.) will not be scheduled earlier than 11:59 PM of the day after the due date, or (3.) will be scheduled for 11:59 PM on the due date, but can be changed by an LSR supplement received no later than 9:00 PM local time on the due date. This LSR supplement must be submitted in accordance with local practices governing LSR exchange, including such communications by telephone, fax, etc.

#### **IV. CONSIDERATION OF THE ACTIVATE SOLUTION**

14. As Qwest implemented the Delayed Disconnect solution, Qwest also gathered information on the Activate solution that AT&T had suggested, a solution that purported to be similar to processes BellSouth had implemented.

15. Qwest developed a preliminary Order of Magnitude estimate of time and costs to implement a solution that would use the NPAC activation as the basis for triggering the disconnect process. The Order of Magnitude included an estimate for Qwest's development costs and for vendor software. Qwest provided the preliminary Order of Magnitude estimate to the Arizona Commission Staff in September 2001, under confidential cover.

16. Qwest also discussed potential solutions with two vendors who support LNP with software services. These vendors provided their estimates and solutions to Qwest under proprietary agreements.

17. Based on discussions with Qwest's Information Technologies LNP SMEs regarding both vendor proposals, Qwest would need to make significant changes to its SOPs to implement the Activate solution. In this regard, the Commission should note that many of Qwest's SOPs are different from BellSouth's SOPs. Currently, there are numerous enhancements being made to the SOPs in connection with the Third Party OSS tests as well as CMP requests. Thus, it is difficult to predict how implementation of the Activate solution at this time would affect Qwest's SOPs, if Qwest were ordered to provide the Activate solution, or how modifications to the SOPs would affect possible implementation of the Activate solution.

18. Qwest has updated the Order of Magnitude estimate to include the costs of the proposed vendor solutions, the estimated development costs for the impacted Qwest systems to the extent Qwest can predict those at this time, and the hardware costs associated with the

integration of the vendor software and Qwest's internal systems. The updated Order of Magnitude estimate is attached as Confidential Exhibit 1.

19. The total costs for implementing the Activate solution, based on the vendor costs and Qwest's preliminary cost estimates for integrating one of the proposed vendor solutions, are several million dollars. The costs identified in the Order of Magnitude estimate include hardware, which would likely range between \$.5M and \$1.2M. Qwest developed the software and hardware estimates based on preliminary system definitions with general assumptions regarding the overall architecture of the systems changes and process flows.

20. The earliest date that these changes could be implemented is nine to twelve months from completion of detailed design specifications. Qwest estimates that completion of these design specifications could take three to six months. The estimated implementation timeframe is based on the initial vendor responses, the time required for Qwest's internal systems development, the timing of the current SOPs enhancements that are underway and the potential availability of hardware.

21. If Qwest were to proceed with development of the Activate solution, detailed design discussions would need to take place with the selected vendor and internally within Qwest. The Activate solution would require significant changes to the Service Order Administration (SOAC) system, MARCH, and the LNP Service Management System (LSMS). No changes would be required to IMA, but internal development would be required for:

- the Flow Through System (FTS), to extend the Local Service Request Due Date
- Service Order Processing systems (SOPs), to accept an extended Due Date and place the date within the SOA messages; this is a critical deviation from the existing SOA interface specification
- LMOS, to complete Service Orders on the pending pass
- Loss & Completion (L&C) Reports, to convert pending pass to a completion pass

CRIS, E911 and LIDB; assume no program changes but end-to-end testing will be required to ensure that SOPs interfaces are functioning correctly

22. There are also several outstanding issues and questions that need to be addressed with the vendors. For example, it is not clear: how multi-line or partial port orders will be handled, how the service orders will be processed when a correction ("COR") pass needs to be generated, whether MARCH will send the translation to the switch or whether complex translations or route indexes will be impacted, and so forth. Further investigation would be required to change current high-level assumptions into detailed design specifications. Once the detailed design specifications have been completed, a more definitive development timeline and implementation schedule could be developed.

#### **V. TIMELINESS OF DISCONNECTS**

23. Qwest previously presented interim results of its disconnect performance to Staff and the Commission in September, 2001. The first results for the new OP-17 measurement have now been issued and are available on the Qwest website at the following address: <http://www.qwest.com/wholesale/results/>. The OP-17 performance data for October through December 2001 confirms that the mechanized solution Qwest implemented has been effective in resolving the LNP disconnect coordination issue. Following are the individual state and regional results:

<b>OP-17</b>	<b>October 2001</b>		<b>November 2001</b>		<b>December 2001</b>	
<b>State</b>	<b>%</b>	<b>Misses</b>	<b>%</b>	<b>Misses</b>	<b>%</b>	<b>Misses</b>
<b>AZ</b>	<b>99.98</b>	<b>1</b>	<b>99.98</b>	<b>2</b>	<b>100</b>	
<b>CO</b>	<b>100</b>		<b>99.98</b>	<b>1</b>	<b>100</b>	
<b>ID</b>	<b>100</b>		<b>100</b>		<b>100</b>	
<b>IA</b>	<b>100</b>		<b>100</b>		<b>100</b>	
<b>MN</b>	<b>99.99</b>	<b>1</b>	<b>100</b>		<b>99.96</b>	<b>3</b>
<b>MT</b>	<b>100</b>		<b>100</b>		<b>100</b>	

<b>OP-17</b>	<b>October 2001</b>		<b>November 2001</b>		<b>December 2001</b>	
<b>State</b>	<b>%</b>	<b>Misses</b>	<b>%</b>	<b>Misses</b>	<b>%</b>	<b>Misses</b>
<b>NE</b>	<b>99.97</b>	<b>1</b>	<b>100</b>		<b>100</b>	
<b>NM</b>	<b>100</b>		<b>100</b>		<b>100</b>	
<b>ND</b>	<b>100</b>		<b>100</b>		<b>100</b>	
<b>OR</b>	<b>100</b>		<b>100</b>		<b>99.91</b>	<b>4</b>
<b>SD</b>	<b>100</b>		<b>100</b>		<b>100</b>	
<b>UT</b>	<b>99.97</b>	<b>1</b>	<b>100</b>		<b>99.98</b>	<b>1</b>
<b>WA</b>	<b>100</b>		<b>100</b>		<b>99.95</b>	<b>4</b>
<b>WY</b>	<b>NA*</b>		<b>NA*</b>		<b>NA*</b>	
<b>REGION</b>	<b>99.99</b>	<b>4</b>	<b>99.99</b>	<b>3</b>	<b>99.98</b>	<b>11</b>
<b>TNs Ported</b>	<b>43,933</b>		<b>45,527</b>		<b>52,576</b>	

\*No TNs ported in WY during 4<sup>th</sup> Qtr. 2001

24. There is no indication that Qwest's performance for timeliness of disconnects would be improved or that there would be less disruption of service with the Activate solution. Basing the disconnect activity on the CLEC's NPAC subscription activation provides no additional assurance that service for the end user customer has actually been activated in the CLEC switch. For example, Qwest often receives escalation calls to the ISC from CLECs that have activated the port in the NPAC database and then discover that they are either unable to provision the service in their switch or are experiencing problems with their loop.

25. When the CLEC sends its activation to the NPAC but is unable to provision service, the end user customer is out-of-service if the old service provider has worked the disconnect based on the activation message. Based on discussions at the industry LNP meetings, this is a significant problem with the Activate solution. In some cases, when the customer is out-of-service, trouble reports are received from the end user customer, instead of from the CLEC. The CLEC controls the NPAC record and activation, so Qwest would not be able to modify the subscription in the NPAC.

26. Furthermore, based on the completed service order, the facilities associated with the telephone number ("TN") being ported are released in the downstream operations systems, and are available for reassignment to other customers. Depending on how long it takes the CLEC to notify Qwest of the CLEC's failure to provision service, those facilities may be reassigned, making the restoral of service difficult.

27. Based on discussions at the industry LNP meetings, other problems may be experienced with the Activate solution:

- a. Orders are cancelled with no notification by the CLEC. In this case, the service order remains in pending status indefinitely, waiting for the NPAC activation message. During that indefinite period of time, Qwest may receive a subsequent order for that end user customer from either a different CLEC for LNP, or for resale service or from Qwest's retail operations. The subsequent order is rejected by the SOPs, due to the original pending LNP order. Eventually, as a result of a complaint from the end user customer or another CLEC or a Reseller, or during an investigation of orders not completed in the SOPs, there will be a referral to wholesale to resolve the order issue. Qwest must then contact the CLEC to determine why the subscription was not activated.
- b. Orders may include multiple telephone numbers, where no activation is received for one or more of the numbers. Because not all numbers are activated by the CLEC in the NPAC, the Qwest LNP order remains in pending status and requires manual investigation. Qwest must contact the CLEC to determine whether the number should be disconnected, or whether the end user customer wants Qwest to continue service for the telephone number(s). This may cause billing problems. It may also result in held orders for other customers (wholesale or retail) where the facilities associated with the pending disconnect order might have been used.

28. The real key, with any solution, is communication. As described above, even with the Activate solution, problems may be experienced that could be resolved with communication between the service providers. In any event, Qwest makes every effort, even when notified late, to ensure that a customer's service is not disrupted, or that service is restored as soon as possible in the event that it is disrupted. In those situations where the CLEC is unable to complete its installation, it is critical that the CLEC communicate with Qwest, to ensure that the end user customer's service is not disconnected.

I hereby swear and affirm that the information contained herein is true and correct to the best of my knowledge and belief.

Further affiant sayeth not.

Maureen L. Callan  
Maureen L. Callan

SUBSCRIBED AND SWORN to before me this 7<sup>th</sup> day of February, 2002.

Candace A. Mowbray  
Notary Public residing at  
Denver, Colorado

My Commission Expires:

April 13, 2002

**EXHIBIT 1**

**CONFIDENTIAL AND PROPRIETARY**

**(REDACTED VERSION)**